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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

March 10, 1993

**HAND DELIVERY**

Ms. Donna Searcy  
Federal Communications Commission  
1919 M Street, N.W.  
Room 227  
Washington, D.C. 20554

Re: GEN Docket No. 90-314  
ET Docket No. 92-100✓  
Ex Parte Presentation

Dear Ms. Searcy:

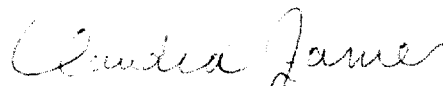
Pursuant to Section 1.1206 of the Commission's rules, this is to advise you that, in their capacity as participants in "PCS Action," a new coalition of companies to promote the deployment of PCS services, the following persons met today with Commissioner Ervin S. Duggan:

Claudia James (Podesta Associates)  
Douglas Smith (Omnipoint Corporation)  
Scott Schelle (American Personal Communications)  
Alex Netchvolodoff (Cox Enterprises, Inc.)  
Kevin Kelley (Qualcomm, Inc.)

During this meeting, the members of PCS Action discussed their position with respect to the Commission's proposals in the above-referenced rulemaking proceedings. The attached Fact Sheet was provided to Commissioner Duggan at this meeting.

In accordance with the Commission's rules, we are hereby submitting one original and one copy of this letter and its attachment for each of the above-referenced proceedings.

Very truly yours,



For Podesta and Associates, Inc.

cc: Commissioner Ervin S. Duggan

Enclosure

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FACT SHEET

PCS ACTION

What Is PCS Action?

PCS Action is a new coalition of companies promoting the roll out of PCS services. The member companies comprise competitors, companies from different locations in the United States, of different sizes and from different sectors of the American economy, manufacturers and leaders in different technologies such as cable, cellular, and print media. They have joined together to seek the rapid licensing and commercial introduction of PCS.

What is PCS?

PCS stands for Personal Communications Services. PCS is a family of digital, high capacity, telecommunications services that offer affordable mobile communications of both data and voice.

Because they are designed to enable people or devices to communicate independent of any fixed location, PCS allow people to communicate anytime and virtually anywhere. Consumer and business applications include low cost mobile telephony services using pocket sized handsets, wireless PBX and computer networks, and mobile transmissions of information to and from laptop computers, palm tops, and electronic organizers. Special applications for education, health care, and security use are also part of the PCS potential. And PCS is anticipated to cost 30% to 50% less than the cost of cellular services today.

By bringing more services to more people at lower cost, PCS will have a broad and favorable impact on American families and businesses.

What Are The Goals Of PCS Action?

PCS Action's goals include:

1. Promoting a rapid and broad deployment of PCS.

The PCS industry is ready now to offer a family of low cost personal communication services. PCS, if promptly

and properly licensed, can generate close to \$200 billion in new commercial activity by the end of the next decade and create more than 300,000 good new American jobs. Deployment of this new technology and the generation of new jobs and commercial activity is government action: the issuance of commercial PCS licenses.

2. Ensuring that 40 MHz of spectrum is made available to each PCS licensee.

Sufficient spectrum is necessary to deploy PCS effectively. PCS, unlike other services, will share the spectrum band with thousands of microwave users. 40 MHz of spectrum per licensee is needed to allow PCS licensees to accommodate the needs of existing microwave users with whom they will be sharing spectrum. Too little spectrum will leave little flexibility to accommodate existing licensees, such as utilities, railroads and public safety organizations. Moreover, given the presence of incumbent licensees, 40 MHz of spectrum is necessary to provide the full array of data communications.

3. Ensuring that two, and certainly no more than three, PCS licensees are issued to each market.

Landline, cellular, SMR and other mobile service providers exist today and will compete in each market with future PCS providers. More than two PCS licenses would over-saturate potential markets and marginalize this new service, making it difficult or impossible for PCS providers to compete with these entrenched technologies.

4. Ensuring that well-qualified PCS licensees are selected by an expeditious mechanism.

However selected, PCS licensees should be well qualified to operate these businesses in the public interest. Past allocation techniques have resulted in years of delay; a mechanism should be adopted that will substantially shorten the implementation period for PCS and maintain the quality of licensees.

5. Ensuring that unlicensed PCS be implemented expeditiously and in a manner that does not disadvantage or delay the implementation of licensed PCS.

PCS technology will bring the concept of the "wireless office" into reality. Wireless LANs, wireless PBXs, and other wireless office devices can be deployed on an unlicensed basis. It is in the PCS industry's interest to have these unlicensed PCS devices implemented expeditiously, and to allow for interoperability between licensed and unlicensed PCS where applicable. This will bring about truly efficient wireless networks.

Who Are The Members Of PCS Action?

The members of PCS Action at this time are:

- o American Personal Communications/  
Washington Post Co.
- o Associated PCN Company
- o Cox Enterprises, Inc.
- o Crown Media
- o MCI Communications, Inc.
- o Northern Telecom
- o Omnipoint Communications, Inc.
- o Providence Journal Co.
- o Qualcomm, Inc.
- o Times Mirror Cable Television, Inc.
- o Time Warner Telecommunications

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Spokesperson for PCS Action, Inc.